

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Edward C. Tomaszewski, Jr

Debtor

Chapter 13

Bankruptcy No. 24-12260-AMC

TRUSTEE'S MOTION TO DISMISS WITH A BAR ORDER
PURSUANT TO 11 U.S.C. SECTIONS 105 AND 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 07/01/2024.
3. This Motion to Dismiss has been filed for the following reason(s):
 - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).
 - The Plan does not appear to be feasible.
4. The debtor has filed two prior bankruptcy cases, either individually, or jointly with a spouse, as follows:
 - (1) 19-16769-JKF, Chapter 13, filed by Edward C. Tomaszewski, Jr. on October 30, 2019. The case was dismissed on Trustee's Motion to Dismiss on April 1, 2020 due to failure of debtor to make plan payments.
 - (2) 23-13357-AMC, Chapter 13, filed by Edward C. Tomaszewski, Jr. on November 6, 2023. The case was dismissed by the Court on December 29, 2023 due to failure of debtor to timely file required documents.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, respectfully requests that, pursuant to 11 U.S.C. Sections 105 and 1307, the Court enter an Order dismissing this case and barring the debtor from filing another bankruptcy petition, either individually or jointly with a spouse, without prior leave of Court FOR A PERIOD OF ONE YEAR.

Date: 01/15/2025

Respectfully submitted,

/s/ Ann Swartz, Esq.

Ann Swartz, Esq.

for

Scott F. Waterman, Esq.

Standing Chapter 13 Trustee

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